

### REMARKS

Initially, in the Office Action dated March 5, 2003, the Examiner has rejected claims 1, 3-5, 7, 13, 15-17, 20, 25, 27-29 and 32 under 35 USC §102(e) as being anticipated by U.S. Patent No. 5,848,373 (Delorme). Claims 1, 3-13, 15-25, 27-36 have been rejected under 35 USC §103(a) as being unpatentable over U.S. Patent No. WO 97/07467 (Phelan et al.) in view of "Maps alive: Viewing Geospatial Information on the WWW", Computer Networks and ISDN systems 29, 1977 (Potmesil) and further in view of what would have been obvious to one of ordinary skill in the art at the time of the invention. Claims 6, 8-10, 11, 12, 18, 19, 21-24, 30 and 31 have been rejected under 35 USC §103(a) as being unpatentable over Delorme and further in view of what would have been obvious to one of ordinary skill in the art at the time of the invention.

By the present response, Applicant has canceled claims 3 and 5. Applicant has amended claims 1, 4, 13 and 25 to further clarify the invention. Applicant has submitted new claim 37 for consideration by the Examiner. Claims 1, 2, 4, 6-37 remain pending in the present application.

### 35 USC §102 Rejections

Claims 1, 3-5, 7, 13, 15-17, 20, 25, 27-29 and 32 have been rejected under 35 USC §102(e) as being anticipated by U.S. Patent No. 5,848,373 (Delorme et al.). Applicant respectfully traverses these rejections.

Regarding claims 1, 13 and 25, Applicant submits that Delorme et al. does not disclose or suggest the limitations in the combination of these claims of, inter alia, location information being stored in a storage by users of mobile terminals

positioned near at least one of a plurality of geographical points for use by other users of mobile terminals when positioned near said at least one of the plurality of geographical points; or storage means responsive to a storage request, including positioning information, initiated by a first user of a mobile terminal positioned near a first geographical point for storing location information about said first geographical point; or retrieval means responsive to a retrieval request, including positioning information, initiated by a second user of a mobile terminal positioned near a second geographical point for retrieving location information concerning said first geographical point corresponding to said positioning information. Delorme et al. does not disclose or suggest these limitations in the combination of these claims of the present application.

DeLorme et al. discloses a computer aided map location system which allows users of the mobile terminals to access map information in a computer. The computer correlates, coordinates, and communicates information in a common geographical coordinate system such as the latitude/longitude coordinate system. In response to a query by a user of the mobile terminal, a display may be presented that presents a grid quadrangle correlated with a grid quadrangle of a printed map from a set of maps in a database. The mobile terminal may also include a GPS location system for displaying the location of the user on the display.

Delorme et al. does not disclose or suggest location information being stored in storage by users of mobile terminals positioned near geographical point for use by other users of mobile terminals when positioned near the geographical point.

Delorme relates to presenting display information about a user related to the location of that user. Delorme et al. does not disclose or suggest location information being

stored by one user at a geographical point for use by other users when they are positioned near that geographical point. Similarly, Delorme et al. does not disclose or suggest storage means responsive to a storage request, including positioning information, initiated by a first user of a mobile terminal positioned near a first geographical point for storing location information about the first geographical point or retrieval means responsive to a retrieval request, including positioning information, initiated by a second user of a mobile terminal positioned near a second geographical point for retrieving location information concerning the first geographical point corresponding to the positioning information. Delorme et al. does not disclose or suggest anything related to a first user and second user, or first geographical point and second geographical point, as recited in the claims of the present application.

Regarding claims 3-5, 7, 15-17, 20, 27-29 and 32, Applicant submits that these claims are dependent on one of independent claims 1, 13 or 25 and, therefore, are patentable at least for the same reasons noted previously regarding these independent claims.

Accordingly, Applicant submits that Delorme et al. does not disclose or suggest the limitations in the combination of each of claims 1, 3-5, 7, 13, 15-17, 20, 25, 27-29 and 32 of the present application. Applicant respectfully requests that these rejections be withdrawn and that these claims be allowed.

#### 35 USC §103 Rejections

Claims 1, 3-13, 15-25, 27-36 have been rejected under 35 USC §103(a) as being unpatentable over Phelan et al. in view of Potmesil and further in view of what

would have been obvious to one of ordinary skill in the art at the time of the invention. Applicant respectfully traverses these rejections.

Similar to Delorme et al., Phelan et al. merely provides for making location information accessible by mobile terminals according to the position of the mobile terminal as determined using a global positioning system. As taught by Phelan et al., the location information can be retrieved from storage by a mobile terminal using positioning information. A map of the area is provided that may include details associated with the geographical coordinates of the location, such as, hotels, shops, etc.

Potmesil discloses a WWW-based system that allows users to view, search and post geographically-indexed information of the Earth. This information may be displayed directly or via clickable anchors on top of 2D maps or in full 3D environments.

Regarding claims 1, 13 and 25, Applicant submits that none of the cited references, taken alone or in any proper combination, disclose, suggest or render obvious the limitations in the combination of these claims of, inter alia, location information being stored in a storage by users of mobile terminals positioned near at least one of a plurality of geographical points for use by other users of mobile terminals when positioned near said at least one of the plurality of geographical points; or storage means responsive to a storage request, including positioning information, initiated by a first user of a mobile terminal positioned near a first geographical point for storing location information about said first geographical point; or retrieval means responsive to a retrieval request, including positioning information, initiated by a second user of a mobile terminal positioned near a second

geographical point for retrieving location information concerning said first geographical point corresponding to said positioning information.

None of the cited references disclose or suggest location information being stored in storage by users of mobile terminals positioned near geographical point for use by other users of mobile terminals when positioned near the geographical point.

Phelan et al. relates to making location information accessible by mobile terminals according to the position of the mobile terminal as determined using a global positioning system. Potmesil relates to WWW-based system that allows users to view, search and post geographically-indexed information of the Earth. None of the cited references disclose or suggest location information being stored by one user at a geographical point for use by other users when they are positioned near that geographical point. Similarly, none of the cited references disclose or suggest storage means responsive to a storage request, including positioning information, initiated by a first user of a mobile terminal positioned near a first geographical point for storing location information about the first geographical point or retrieval means responsive to a retrieval request, including positioning information, initiated by a second user of a mobile terminal positioned near a second geographical point for retrieving location information concerning the first geographical point corresponding to the positioning information. Neither Phelan et al. nor Potmesil, taken alone or in combination, disclose or suggest anything related to a first user and second user, or first geographical point and second geographical point, as recited in the claims of the present application.

Regarding claims 3-12, 15-24 and 27-36, Applicant submits that these claims are dependent on one of independent claims 1, 13 or 25 and, therefore, are

patentable at least for the same reasons noted previously regarding these independent claims.

Accordingly, Applicant submits that none or the cited references, taken alone or in any proper combination, disclose, suggest, or render obvious the limitations in the combination of each of claims 1, 3-13, 15-25, 27-36 of the present application. Applicant respectfully requests that these rejections be withdrawn and that these claims be allowed.

Claims 6, 8-10, 11, 12, 18, 19, 21-24, 30 and 31 have been rejected under 35 USC §103(a) as being unpatentable over Delorme and further in view of what would have been obvious to one of ordinary skill in the art at the time of the invention. Applicant respectfully traverse these rejections and submits that these claims are dependent on one of independent claims 1, 13 or 25 and, therefore, are patentable at least for the same reasons noted previously regarding these independent claims. Applicant asserts that the Examiner's view of what would have been obvious to one of ordinary skill in the art at the time of the invention does not overcome the substantial defects noted previously regarding Delorme. Specifically, Delorme et al. does not disclose or suggest location information being stored in storage by users of mobile terminals positioned near geographical point for use by other users of mobile terminals when positioned near the geographical point. Delorme relates to presenting display information about a user related to the location of that user. Delorme et al. does not disclose or suggest location information being stored by one user at a geographical point for use by other users when they are positioned near that geographical point.

Accordingly, Applicant submits that none of the cited references or assertions, taken alone or in any proper combination, disclose, suggest, or render obvious the limitations in the combination of each of claims 6, 8-10, 11, 12, 18, 19, 21-24, 30 and 31 of the present application. Applicant respectfully requests that these rejections be withdrawn and that these claims be allowed.

In view of the foregoing amendments and remarks, Applicant submits that claims 1, 2, 4, 6-37 are now in condition for allowance. Accordingly, early allowance of such claims is respectfully requested.

Attached hereto is a marked-up version of the changes made to the specification and claims by the current amendment. The attachment is captioned **"Version with markings to show changes made."**

To the extent necessary, Applicants petition for an extension of time under 37 CFR §1.136. Please charge any shortage in fees due in connection with the filing of this paper, or credit any overpayment of fees, to the deposit account of Antonelli, Terry, Stout & Kraus, LLP, Deposit Account No. 01-2135 (0171.36935X00).

Respectfully submitted,



Frederick D. Bailey  
Registration No. 42,282  
ANTONELLI, TERRY, STOUT & KRAUS, LLP

FDB/pay  
(703) 312-6600

**Version with markings to show changes made**

**IN THE CLAIMS**

Please amend the claims as follows.

1. (Twice Amended) A collaborative location server for storing, retrieving and publishing location information input by a plurality of users of mobile terminals with respect to geographical points, comprising:

a storage which stores location information in corresponding relation to each of a plurality of geographical points, [wherein] said location information [provides] providing information concerning said geographical points,

wherein said location information is stored in said storage by users of mobile terminals positioned near at least one of the plurality of geographical points for use by other users of mobile terminals when [information about a] positioned near said at least one of the plurality of geographical [point] points; [is desired; and]

storage [and retrieval] means responsive to a storage request, including positioning information, [from] initiated by a first user of a mobile terminal positioned near a first geographical point for storing location information about [a] said first geographical point; and

retrieval means responsive to a retrieval request [located at said positioning information and responsive to a retrieval request], including positioning information, [from] initiated by a second user of a mobile terminal positioned near a second geographical point for retrieving [desired] location information concerning said first [a] geographical point corresponding to said positioning information.

4. (Twice Amended) A collaborative location server according to claim [3] 1,



wherein said positioning information included in each of said storage and retrieval requests transmitted by said mobile terminal is supplied by a positioning system.

13. (Twice Amended) A method of storing, retrieving and publishing location information input by a plurality of users of mobile terminals with respect to geographical points comprising the steps of:

storing location information in corresponding relation to each of a plurality of geographical points,

wherein said location information provides information concerning said geographical points,

wherein said location information is stored in said storage by users of mobile terminals for use by other users of mobile terminals positioned near at least one of the plurality of geographical points for use by other users of mobile terminals when [information about a] positioned near said at least one of the plurality of geographical [point] points [is desired]; and

in response to a storage request, including positioning information, [from] initiated by a first user of a mobile terminal positioned near a first geographical point, storing location information about [a] said first geographical point located at said positioning information and in response to a retrieval request, including positioning information, initiated by [from] a second user of a mobile terminal positioned near a second geographical point, retrieving [desired] location information concerning [a] said first geographical point corresponding to said positioning information.

25. (Twice Amended) A collaborative location system for storing, retrieving

and publishing location information input by a plurality of users of mobile terminals with respect to geographical points, comprising:

a plurality of location servers each storing and retrieving location information input by a plurality of users of mobile terminals with respect to geographical points included within a predefined area, said each collaborative location server comprises:

a storage which stores location information in corresponding relation to each of a plurality of geographical points,

wherein said location information provides information concerning said geographical points,

wherein said location information is stored in said storage by users of mobile terminals positioned near at least one of the plurality of geographical points for use by other users of mobile terminals when positioned near said at least one of the plurality of geographical points [information about a geographical point is desired], and

storage and retrieval means responsive to a storage request, including positioning information, initiated by [from] a first user of a mobile terminal positioned near a first geographical point for storing location information about [a] said first geographical point located at said positioning information and retrieval request, including positioning information, initiated by [from] a second user of a mobile terminal positioned near a second geographical point for retrieving [desired] location information concerning [a] said first geographical point corresponding to said positioning information.